

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

UNITED STATES OF AMERICA

V.

COREY DONOVAN

NO. 1:21-CR-00088-JL

**STATUS REPORT OF COUNSEL RE:**  
**DEFENDANT'S PRO SE MOTION TO RETURN PROPERTY**

Now comes counsel for the defendant, Donna J. Brown, and hereby submits this status report pursuant to this Court's Order of January 10, 2025.

Undersigned counsel filed a status report on March 11, 2025 and will not repeat the background and facts set forth in that pleading. In that pleading, undersigned counsel asked this Court to defer ruling on the above-mentioned motion as the Government proposed that, to resolve this issue, it would work with their paralegal to attempt to put together a spreadsheet of all of the jail calls of record in the Government's file and that this spreadsheet could serve as a basis to cross-reference the phone records in possession of the defendant.

On this date, the Government sent an email and an attachment to undersigned counsel that detailed their efforts to investigate the issues raised in the defendant's pro se motion. The Government indicated that they have reached out to the investigator in the case and are still waiting to hear back from the investigating agent regarding this issue. As undersigned counsel only received this information on this date, she will need additional time to review the email and attachment with Mr. Donovan. Therefore, undersigned counsel proposes that this court defer ruling on the motion to return property for an additional 30 days.

Respectfully submitted,

Corey Donovan

By His Attorney,

Date: April 10, 2025

/s/ Donna J. Brown

Donna J. Brown

N.H. Bar No. 387

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 10, 2025, the above notice was served electronically through CM/ECF upon all counsel of record.

/s/ Donna J. Brown  
Donna J. Brown #387